

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

CORRINE LUCAS, individually and on behalf of and all
others similarly situated,

Plaintiffs,

v.

CASE NO. 2:22-cv-00591

INTERCONTINENTAL CAPITAL GROUP, INC.,

Defendant.

**NOTICE OF MOTION FOR CONDITIONAL CERTIFICATION PURSUANT TO 29
U.S.C. § 216(b) OF THE FAIR LABOR STANDARDS ACT (“FLSA”) AND FOR
EQUITABLE TOLLING FOR MEMEBERS OF THE PUTATIVE COLLECTIVE
ACTION**

PLEASE TAKE NOTICE that upon the annexed Declaration of Lloyd R. Ambinder, Esq., sworn to on February 11, 2022, and upon all prior papers and proceedings herein, Plaintiffs by their undersigned attorneys, will move before the Honorable Arlene R. Lindsay, at the United States Courthouse for the Eastern District of New York, located at 814 Federal Plaza, Central Islip, New York 11722-4451, on a return date set by the Court, to permit Court supervised notification to putative collective action members pursuant to the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 216(b), together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York
February 11, 2022

Respectfully submitted,

CORRINE LUCAS,
on behalf of herself and all others similarly
situated

By Counsel

/s/ Michele A. Moreno, Esq.
Lloyd R. Ambinder, Esq.
Michele A. Moreno, Esq.
40 Broad Street, 7th Floor
New York, New York 10004
Telephone: (212) 943-9080
Facsimile: (212) 943-9082
lambinder@vandallp.com
mmoreno@vandallp.com

/s/Timothy Coffield
Timothy Coffield (VSB No. 83430)
Pro Hac Vice Anticipated
COFFIELD PLC
106-F Melbourne Park Circle
Charlottesville, VA 22901
P: (434) 218-3133 F: (434) 321-1636
tc@coffieldlaw.com

and

/s/ Craig Juraj Curwood
Craig Juraj Curwood (VSB No. 43975)
Zev Antell (VSB No. 74634)
Pro Hac Vice Anticipated
ButlerCurwood, PLC
140 Virginia Street, Suite 302
Richmond, VA 23219
804.648.4848
craig@butlercurwood.com
zev@butlercurwood.com

Counsel for Plaintiffs